



UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA

June 2025 Grand Jury

UNITED STATES OF AMERICA,

Plaintiff,

v.

BAHRAM MOHAMMAD OSTOVARI,

Defendant.

CR 2:25-cr-00573-AH

I N D I C T M E N T

[50 U.S.C. §§ 1705(a) and (c):
Conspiracy to Violate the
International Emergency Economic
Powers Act; 50 U.S.C. §§ 1705(a)
and (c): Violation of the
International Emergency Economic
Powers Act; 18 U.S.C.
§ 981(a)(1)(C) and 28 U.S.C.
§ 2461(c): Criminal Forfeiture]

The Grand Jury charges:

INTRODUCTORY ALLEGATIONS

At all times relevant to this Indictment, unless otherwise
indicated:

I. The Defendant and the Relevant Entities

1. Defendant BAHRAM MOHAMMAD OSTOVARI ("OSTOVARI") was an
Iranian national and, beginning on May 11, 2020, a lawful permanent
resident of the United States.

2. Company A was a railway signaling and communications
systems engineering firm based in Tehran, Iran. Company A, which

1 defendant OSTOVARI founded in or around 1986, had one of the largest
2 mass transit project management portfolios in Iran and was
3 responsible for helping to develop metro and light rail systems in
4 Tehran, Esfahan, and other Iranian cities.

5 3. MH-SYS FZCO ("MH-SYS") was a reseller of railway signaling
6 and communications systems equipment based in the Jebel Ali Free Zone
7 in Dubai, United Arab Emirates ("UAE"). Defendant OSTOVARI founded
8 MH-SYS in 2003, and was MH-SYS's Managing Director and controlling
9 shareholder.

10 4. Match Systech FZE ("Match Systech") was an entity
11 incorporated in Dubai, UAE, in or about April 2019. Defendant
12 OSTOVARI operated and controlled Match Systech.

13 5. MH-SYS and Match Systech were front companies and alter ego
14 companies used by OSTOVARI to procure U.S.-origin electronics and
15 electrical components, including U.S. export-controlled items and
16 other U.S.-origin items, on behalf of Company A in Iran.

17 II. Relevant Statutory and Regulatory Background

18 A. The International Emergency Economic Powers Act and the 19 Iranian Transactions and Sanctions Regulations

20 6. The International Emergency Economic Powers Act ("IEEPA"),
21 50 U.S.C. § 1701, et seq., granted the President of the United States
22 the authority to deal with unusual and extraordinary threats to the
23 national security, foreign policy, or economy of the United States.
24 Pursuant to that authority, the President could declare a national
25 emergency through Executive Orders that had the full force and effect
26 of law.

27 7. Under IEEPA, it was a crime to willfully violate, attempt
28 to violate, conspire to violate, or cause a violation of any order,

1 license, regulation, or prohibition issued pursuant to the statute.
2 50 U.S.C. § 1705(a). Pursuant to Section 1705(c), any person who
3 willfully committed, attempted to commit, conspired to commit, or
4 aided and abetted the commission of any unlawful act as described in
5 50 U.S.C. § 1705(a) of the statute was guilty of a crime.

6 8. On March 15, 1995, the President issued Executive Order
7 12,957, which found that the actions and policies of the government
8 of Iran constituted an unusual and extraordinary threat and declared
9 a national emergency under IEEPA to deal with that threat. 60 Fed.
10 Reg. 14,615 (Mar. 17, 1995). In two subsequent Executive Orders in
11 1995 and 1997, the President imposed comprehensive sanctions on Iran
12 and clarified the original declaration of a national emergency. See
13 Exec. Order No. 13,059, 62 Fed. Reg. 44,531 (Aug. 21, 1997); Exec.
14 Order No. 12,959, 60 Fed. Reg. 24,757 (May 9, 1995). Since 1997, the
15 President has continued the national emergency with respect to Iran
16 and the 1995 and 1997 Executive Orders. The most recent continuation
17 of this national emergency was on or about March 7, 2025.

18 9. To respond to the national emergency with respect to Iran,
19 the Secretary of the Treasury, through the Office of Foreign Assets
20 Control ("OFAC"), issued the Iranian Transactions and Sanctions
21 Regulations ("ITSR"), 31 C.F.R. Part 560. Absent permission from
22 OFAC in the form of a license, the ITSR prohibited, among other
23 things:

24 a. The exportation, reexportation, sale, or supply,
25 directly or indirectly, from the United States, or by a U.S. person,
26 wherever located, of any goods, technology, or services to Iran or
27 the Government of Iran, including the exportation, reexportation,
28 sale, or supply of any goods, technology, or services to a person in

1 a third country with knowledge or reason to know that such goods,
2 technology, or services were intended specifically for supply, trans-
3 shipment, or reexportation, directly or indirectly, to Iran or the
4 Government of Iran (31 C.F.R. § 560.204);

5 b. The reexportation from a third country, directly or
6 indirectly, by a person other than a U.S. person, of any goods,
7 technology, or services that have been exported from the United
8 States, if (a) such reexportation was undertaken with knowledge or
9 reason to know that the reexportation is intended specifically for
10 Iran or the Government of Iran; and (b) the exportation of such
11 goods, technology, or services was subject to export license
12 application requirements under any regulations (31 C.F.R. § 560.205);

13 c. Any transaction by a U.S. person, wherever located,
14 involving goods, technology, or services for exportation,
15 reexportation, sale, or supply, directly or indirectly, to Iran or
16 the Government of Iran (31 C.F.R. § 560.206); and

17 d. Any transaction by a U.S. person or within the United
18 States that evaded or avoided, had the purpose of evading or
19 avoiding, or attempted to violate, any of the prohibitions in the
20 ITSR (31 C.F.R. § 560.203).

21 10. The term "U.S. person" means "any United States citizen,
22 permanent resident alien, entity organized under the laws of the
23 United States or any jurisdiction within the United States (including
24 foreign branches), or any person in the United States." 31 C.F.R.
25 § 560.314.

26 B. The Export Administration Regulations

27 11. The Export Administration Regulations ("EAR"), 15 C.F.R.
28 Parts 730-774, which were promulgated by the U.S. Department of

1 Commerce ("DOC"), Bureau of Industry and Security ("BIS"), regulated
2 the export of goods, technology, and software from the United States.

3 12. Through the EAR, BIS reviewed and controlled the export of
4 certain items from the United States to foreign countries. See 15
5 C.F.R. §§ 734.2, 734.3. BIS placed restrictions on the export and
6 reexport of items that it determined could make a significant
7 contribution to the military potential or nuclear proliferation of
8 other nations or that could be detrimental to the foreign policy or
9 national security of the United States. Under the EAR, such
10 restrictions depended on several factors, including the destination
11 country, the end user, and the end use of the item.

12 13. The most sensitive items subject to the EAR controls were
13 identified on the Commerce Control List ("CCL"), set forth in Title
14 15, Code of Federal Regulations, Part 774, Supplement Number 1.
15 Items listed on the CCL were categorized by Export Control
16 Classification Number ("ECCN"), each of which was subject to export
17 control requirements depending on destination, end use, and end user
18 of the item. Items that are not on the CCL, but remain subject to
19 the EAR, were designated as EAR99 and required a valid BIS export
20 authorization (i.e., a license or license exception) if intended to
21 be exported or re-exported to an end-user in Iran.

22 14. Federal law required that exporters or their authorized
23 agents submit an Electronic Export Information ("EEI") filing through
24 the Automated Export System ("AES") for every export of goods from
25 the United States with a value of over \$2,500. An EEI also was
26 required regardless of the value of the goods if the goods required
27 an export license. A material part of the EEI and AES, as well as
28 other export filings, was information concerning the end user and

1 ultimate destination of the export. Failure to make an EEI filing or
2 providing false or misleading information on an EEI filing in the AES
3 was a violation of 13 U.S.C. § 305.

4 III. Overview of the Criminal Scheme

5 15. Beginning at least in or around May 2018, and continuing
6 through the date of this Indictment, defendant OSTOVARI conspired
7 with persons known and unknown to the Grand Jury to devise and
8 execute a scheme to procure electronics and electrical components,
9 including U.S. export-controlled items, on behalf of Company A in
10 Iran. Defendant's co-conspirators included an MH-SYS procurement
11 executive and Match Systech employee ("Co-Conspirator 1"), an MH-SYS
12 employee ("Co-Conspirator 2"), and a Match Systech employee ("Co-
13 Conspirator 3"), whose identities are known to the Grand Jury.

14 16. Defendant OSTOVARI and his co-conspirators used MH-SYS and
15 Match Systech in the UAE to acquire electronics and electrical
16 components and then transship these items from the UAE to Company A
17 in Iran.

18 17. The items defendant OSTOVARI and his co-conspirators
19 procured and transshipped to Iran included sophisticated computer
20 processors and railway signaling equipment. Many of these items were
21 controlled under the EAR, and their export to Iran without a license
22 was prohibited under the EAR and ITSR.

23 18. After defendant OSTOVARI became a lawful permanent resident
24 of the United States in May 2020, defendant OSTOVARI continued to
25 export, reexport, sell, and supply electronics and electrical
26 components to Company A in Iran. Defendant OSTOVARI also continued
27 to own, operate, and control Company A in Iran.

1 19. Defendant OSTOVARI and his co-conspirators were aware of
2 the U.S. sanctions on Iran. For example:

3 a. On September 10, 2019, in response to an inquiry from
4 a UAE-based financial institution, defendant OSTOVARI sent a signed
5 letter to the financial institution stating, "This is to confirm that
6 MH SYS FZCO has no connection directly/indirectly with [Company A]
7 based in Iran. As we are aware of all sanction regulation and we are
8 not dealing with any of the sanction countries."

9 b. On May 5, 2020, defendant OSTOVARI directed Co-
10 Conspirator 2 to provide false information to a BIS export control
11 officer regarding the end user of U.S.-origin goods.

12 c. On June 11, 2020, Co-Conspirator 2 forwarded an email
13 from MH-SYS's auditors to defendant OSTOVARI, informing defendant
14 OSTOVARI that the accounting firm could not complete MH-SYS's audit
15 "due to the sanctions and restrictions that we are facing to work
16 with entities which are dealing with Iran." The auditors noted that
17 there were "transactions and balances in the books of MH-Sys with
18 [Company A], which is [an] Iran based company."

19 20. At no time did defendant OSTOVARI, Company A, MH-SYS, or
20 Match Systech apply for or obtain authorization or a license from
21 OFAC to export, reexport, sell, or supply goods and technologies from
22 the United States to Iran or to the Government of Iran.

23 //

24 //

COUNT ONE

[50 U.S.C. §§ 1705(a), (c);

31 C.F.R. §§ 560.203, 560.204, 560.205, and 560.206]

21. The Grand Jury incorporates and realleges the allegations set forth in paragraphs 1 through 17 above, as if fully set forth herein.

22. Beginning on an unknown date but no later than May 2018, and continuing to the date of this Indictment, in Los Angeles County, within the Central District of California, the United Arab Emirates, Iran, and elsewhere, defendant BAHRAM MOHAMMAD OSTOVARI ("OSTOVARI"), who is expected to be arrested in the Central District of California, and others known and unknown to the Grand Jury, knowingly and willfully conspired to violate the International Emergency Economic Powers Act ("IEEPA"), namely:

a. To knowingly and willfully export, reexport, sell, supply, and cause to be exported goods and technology from the United States to Iran, and by a United States person, wherever located, to Iran, directly and indirectly, including through the United Arab Emirates, without first having obtained authorization or the required license from the United States Department of Treasury's Office of Foreign Assets Control, in violation 50 U.S.C. § 1705(a) and (c), and 31 C.F.R. § 560.204;

b. To knowingly and willfully reexport goods and technology from a third country to Iran, directly or indirectly, by a person other than a U.S. person, goods and technology that have been exported from the United States, without first having obtained authorization or the required license from the United States

1 Department of Treasury's Office of Foreign Assets Control, in
2 violation 50 U.S.C. § 1705(a) and (c), and 31 C.F.R. § 560.205;

3 c. To engage in a transaction by a United States person,
4 wherever located, involving goods and technology for exportation,
5 reexportation, sale, and supply, directly or indirectly, to Iran or
6 the Government of Iran, including through the United Arab Emirates,
7 in violation of 50 U.S.C. § 1705(a) and (c), and 31 C.F.R. § (31
8 C.F.R. § 560.206); and

9 d. To knowingly and willfully enter into transactions
10 within the United States that evaded and avoided, and had the purpose
11 of evading the regulations governing trade and exports from the
12 United States to Iran, and by a United States person, wherever
13 located, to Iran, in violation of 50 U.S.C. § 1705(a) and (c), and 31
14 C.F.R. § 560.203.

15 I. OBJECTS OF THE CONSPIRACY

16 23. The objects of the conspiracy were:

17 a. To acquire electronics and electrical components,
18 including U.S. export-controlled items and other U.S.-origin items,
19 on behalf of Company A and other end users in Iran;

20 b. To export, reexport, sell and supply electronics and
21 electrical components, including U.S. export-controlled items, from
22 the United States to Iran, directly and indirectly, including through
23 the UAE;

24 c. To evade the prohibitions and licensing requirements
25 of IEEPA and the ITSR; and

26 d. To profit from these illegal activities.
27
28

1 II. MEANS BY WHICH THE OBJECTS OF THE CONSPIRACY WERE TO BE
2 ACCOMPLISHED

3 24. The objects of the conspiracy were to be accomplished in
4 substance as follows:

5 a. Company A would secure contracts to supply signaling
6 and communications systems to Iran and the Government of Iran,
7 including on projects for the Islamic Republic of Iran Railways, the
8 Tehran Urban and Suburban Railway Company, and the Esfahan urban
9 railway.

10 b. Defendant OSTOVARI would direct MH-SYS and Match
11 Systech employees, including Co-Conspirator 1, Co-Conspirator 2, and
12 Co-Conspirator 3, to acquire electronics and electrical components,
13 including U.S. export-controlled items and other U.S.-origin items,
14 for Company A in Iran.

15 c. Defendant OSTOVARI would direct MH-SYS and Match
16 Systech employees, including Co-Conspirator 1, Co-Conspirator 2, and
17 Co-Conspirator 3, to transship electronics and electrical components,
18 including U.S. export-controlled items and other U.S.-origin items,
19 from MH-SYS and Match Systech in the UAE to Company A in Iran.

20 d. Defendant OSTOVARI and his co-conspirators would
21 intentionally conceal from companies located in the United States and
22 elsewhere the true identities of the ultimate end users of the
23 electronics and electrical components by providing false and
24 misleading information about the ultimate end users.

25 III. OVERT ACTS

26 25. In furtherance of the conspiracy and to accomplish its
27 objects, on or about the following dates, defendant OSTOVARI, and
28 others known and unknown to the Grand Jury, committed and caused to

1 be committed various overt acts, including but not limited to the
2 following:

3 A. Export of Microcontroller Development Kits from the United
4 States to Company A in Iran

5 Overt Act No. 1: On or about May 25, 2018, Co-Conspirator 1
6 submitted a purchase order on behalf of MH-SYS in the UAE for three
7 development kits for high-performance automotive-grade
8 microcontrollers (part number TMDX570LC43HDK) to a U.S. semiconductor
9 manufacturing company headquartered in Fort Worth, Texas ("U.S.
10 Company 1"), an entity the identity of which is known to the Grand
11 Jury.

12 Overt Act No. 2: According to an EEI filing by U.S. Company 1
13 based on information provided by Co-Conspirator 1, MH-SYS was the
14 ultimate consignee of the microcontroller development kits.

15 Overt Act No. 3: On June 10, 2018, Co-Conspirator 1 sent a
16 commercial invoice and packing list to an employee of Company A,
17 which reflected that MH-SYS had sent the three microcontroller
18 development kits "by passenger" from the UAE to Company A in Iran on
19 or about June 7, 2018.

20 B. Export of Radio-Frequency Amplifier Module from the United
21 States to Company A in Iran

22 Overt Act No. 4: On December 17, 2018, Co-Conspirator 1
23 placed an order on MH-SYS's behalf for a radio frequency ("RF")
24 amplifier module, identified by part number KMA1040M2, from a company
25 headquartered in Washington State ("U.S. Company 2"), an entity the
26 identity of which is known to the Grand Jury.

1 Overt Act No. 5: On December 18, 2018, Co-Conspirator 1 sent
2 U.S. Company 2 a signed End-User Certification, which falsely stated
3 that MH-SYS was the end user of the RF amplifier module.

4 Overt Act No. 6: The invoice for the RF amplifier module
5 contained the following warning: "These commodities are authorized by
6 the U.S. Government for export only to[]United Arab Emirates" and
7 "may not be transferred, transshipped, or otherwise disposed of in
8 any other country, either in their original form or after being
9 incorporated into other end-items, without prior approval of the
10 relevant U.S. government agency."

11 Overt Act No. 7: On January 27, 2019, Co-Conspirator 1 sent
12 defendant OSTOVARI a commercial invoice and packing list, which
13 reflected that MH-SYS had shipped the RF amplifier module and other
14 goods "by passenger" to Company A in Iran on January 24, 2019. The
15 commercial invoice, which was on MH-SYS letterhead and addressed to
16 Company A in Tehran, Iran, listed an RF amplifier module with part
17 number KMA1040M2.

18 C. Defendant OSTOVARI Instructed Co-Conspirator 2 to Withhold
19 Information from and Provide False Information to an Export
20 Control Officer

21 Overt Act No. 8: On or about May 3, 2020, in response to an
22 inquiry from a BIS export control officer ("ECO") regarding whether
23 MH-SYS was the end user of the three microcontroller development kits
24 and the RF amplifier module, Co-Conspirator 2 asked the ECO to send
25 her the relevant documents via email so that she could speak with her
supervisor before responding.

26 Overt Act No. 9: In an email on May 4, 2020, Co-Conspirator 2
27 asked defendant OSTOVARI to advise her on how to respond to the ECO.
28

1 Overt Act No. 10: In an email on May 5, 2020, defendant
2 OSTOVARI directed Co-Conspirator 2 not to provide any substantive
3 information to the ECO, writing: "You should not give him any
4 information if he asks anything and just emphasize that you will
5 reply [to] the inquiry by email." Defendant OSTOVARI also directed
6 Co-Conspirator 2 to tell the ECO that MH-SYS was "not active since
7 2019 because of economic crisis."

8 Overt Act No. 11: On May 7, 2020, defendant OSTOVARI
9 instructed Co-Conspirator 2 via email to tell the ECO that the
10 microcontroller development kits and RF amplifier module were "only
11 samples for evaluation" and were "not sold," when in fact defendant
12 OSTOVARI knew that MH-SYS had exported the goods to Company A in Iran
13 on or about January 24, 2019.

14 Overt Act No. 12: On May 7, 2020, Co-Conspirator 2 emailed
15 this false information to the ECO, per OSTOVARI's instructions
16 described in Overt Act 11, and Bcc'd defendant OSTOVARI on the email.

17 Overt Act No. 13: In an email on May 7, 2020, defendant
18 OSTOVARI advised Co-Conspirator 2 that if the ECO asked to inspect
19 the items, Co-Conspirator 2 should reply that "we do not keep samples
20 for more than six months because of limit of space."

21 Overt Act No. 14: On May 7, 2020, Co-Conspirator 2 relayed
22 this false information to the ECO via email, per OSTOVARI's
23 instructions described in Overt Act 13.

24 D. March 2021 Shipment from MH-SYS in the UAE to Company A in
25 Iran

26 Overt Act No. 15: On May 25, 2020, Match Systech purchased 57
27 railway fanless touchscreen panel PCs (part number E22B710102),
28 containing Intel Atom E3845 processors, from a Taiwanese industrial

1 computer manufacturer ("Taiwanese Manufacturer 1"), an entity the
2 identity of which is known to the Grand Jury, for \$99,750.

3 Overt Act No. 16: On June 30, 2020, Match Systech purchased
4 another 93 railway fanless touchscreen panel PCs (part number
5 E22B710102), containing Intel Atom E3845 processors, from Taiwanese
6 Manufacturer 1 for \$162,750.

7 Overt Act No. 17: On August 27, 2020, defendant OSTOVARI
8 instructed Co-Conspirator 1 to order 25 computer modules (part number
9 E38D312100), containing Intel Atom x7-E3950 processors, from
10 Taiwanese Manufacturer 1. Taiwanese Manufacturer 1 shipped the 25
11 computer modules to Match Systech in the UAE on or about November 30,
12 2020

13 Overt Act No. 18: On November 12, 2020, Co-Conspirator 2 sent
14 defendant OSTOVARI a "signed and stamped" proforma invoice (PI-2021-
15 1) from MH-SYS to Company A, which included the 150 railway fanless
16 touchscreen panel PCs and the 25 computer modules.

17 Overt Act No. 19: On January 25, 2021, defendant OSTOVARI
18 instructed Co-Conspirator 2 to "[p]lease arrange the shipment" of
19 invoice PI-2021-1 "by sea."

20 Overt Act No. 20: On February 14, 2021, Co-Conspirator 2 sent
21 an email to defendant OSTOVARI, attaching a commercial invoice,
22 packing list, and delivery advice for a shipment from MH-SYS in the
23 UAE to Company A in Iran. The attached "Invoice & Packing List" from
24 MH-SYS to Company A, dated February 7, 2021, included 150 items
25 described as "Train Driver Panel Model: E22B710102" and 25 items
26 described as "CPU Module E38D312100." The attached "Delivery Advice"
27 authorized the release of 11 pallets of goods from MH-SYS's warehouse
28

1 to Company A in Iran and indicated that the "exit point" of the goods
2 was Jebel Ali, UAE, and their destination was Bandar Abbas, Iran.

3 Overt Act No. 21: On February 17, 2021, Co-Conspirator 2
4 instructed a UAE freight forwarder to "proceed with the processing of
5 our Shipment" of a "20ft. container" via sea cargo. Co-Conspirator 1
6 attached the same "Invoice & Packing List" and "Delivery Advice" Co-
7 Conspirator 2 sent to defendant OSTOVARI on February 14, 2021, as
8 well as an export permit indicating that the end user was Company A
9 in Tehran, Iran.

10 Overt Act No. 22: On March 4, 2021, Co-Conspirator 2 informed
11 defendant OSTOVARI via email that "our shipment departed already last
12 2nd March 2021" and attached a copy of the original shipping
13 documents. The bill of lading indicated that the shipment left Jebel
14 Ali, UAE, to Bandar Abbas, Iran, on March 2, 2021, on the vessel
15 "YEKTA-2"; that MH-SYS in Dubai, UAE, was the shipper; and that
16 Company A in Tehran, Iran, was the consignee. The packing list and
17 commercial invoice showed that the shipment contained 150 units
18 described as "Locomotive driver panel" and 25 units described as
19 "Computer module Intel E3950-1.6 Ghz."

20 Overt Act No. 23: On January 3, 2022, while defendant OSTOVARI
21 was in the Central District of California, he emailed Co-Conspirator
22 1 to renew the lease for the office space used by MH-SYS.

23 E. November 2024 Shipment of Intel Processors from MH-SYS in
24 the UAE to Company A in Iran

25 Overt Act No. 24: In February 2024, at defendant OSTOVARI's
26 direction, Co-Conspirator 1 ordered 80 railway fanless touchscreen
27 panel PCs (model number GOT710S-857-R-E3845), containing Intel Atom
28 E3845 processors, from Taiwanese Manufacturer 1.

1 Overt Act No. 25: On June 12, 2024, Co-Conspirator 1 sent
2 defendant OSTOVARI a proforma invoice from Match Systech to MH-SYS,
3 which included the 80 touchscreen panel PCs. Co-Conspirator 1 noted
4 that the proforma invoice was revised "as per your instruction."

5 Overt Act No. 26: On June 27, 2024, Co-Conspirator 1 sent
6 defendant OSTOVARI a proforma invoice from Match Systech to Company A
7 for the 80 touchscreen panel PCs and asked defendant OSTOVARI to
8 "[k]indly check and advise." Co-Conspirator 2 sent a revised
9 proforma invoice (PI MST-PI245005) for 40 touchscreen panel PCs for
10 AED 546,000 to defendant OSTOVARI the following day.

11 Overt Act No. 27: On September 3, 2024, while in the Central
12 District of California, defendant OSTOVARI emailed instructions to
13 Co-Conspirator 1 to draft a letter to account for the payment of cash
14 from Company A to Match Systech for the touchscreen panel PCs. In
15 the email, with the subject line "PI MST-PI2425005 AED 546000,"
16 defendant OSTOVARI wrote, "Since you are supposed to receive the
17 amount of PI in cash, please send a letter similar" to an attached
18 example authorizing Co-Conspirator 1 to receive a cash payment in
19 Dubai.

20 Overt Act No. 28: On September 19, 2024, Co-Conspirator 1
21 emailed defendant OSTOVARI, "We have received the cash payment of
22 AED546,000 of Proforma Invoice No. MST-PI2425005," and attached a
23 confirmatory letter from Match Systech to Company A.

24 Overt Act No. 29: On October 15, 2024, defendant OSTOVARI
25 directed Co-Conspirator 1 to arrange the shipment of the touchscreen
26 panel PCs from the UAE to Iran.

27 Overt Act No. 30: On November 4, 2024, Co-Conspirator 1
28 updated defendant OSTOVARI via email that the "shipment departed

1 yesterday" and attached the "original shipping documents." The
2 attached Air Waybill reflected a shipment of 40 railway fanless
3 touchscreen panel PCs from Match Systech in the UAE to Company A in
4 Iran via air freight. The attached commercial invoice (MST-
5 INV2425005) reflected that Match Systech had sold 40 touchscreen
6 panel PCs to Company A in Iran on October 28, 2024, for AED 546,000.

7 Overt Act No. 31: On November 7, 2024, Co-Conspirator 1
8 informed defendant OSTOVARI that "the 40pcs panel shipment under MST-
9 PI2425005" was "now in IKA custom under flight no. W5-0062,"
10 referring to Imam Khomeini International Airport near Tehran, Iran,
11 and a Mahan Air flight from Dubai to Tehran. Co-Conspirator 1 noted
12 that the "[o]riginal documents sent by courier" were "now out for
13 delivery in Tehran."

14 F. November 2024 Shipment of Power Supply Modules from MH-SYS
15 in the UAE to Company A in Iran

16 Overt Act No. 32: On March 3, 2024, Co-Conspirator 1 ordered
17 75 DC/DC regulated power supply modules (model number RSD-60H-24) on
18 behalf of Match Systech from a U.S. electronics distributor
19 headquartered in Massachusetts ("U.S. Company 3"), an entity the
20 identity of which is known to the Grand Jury. The invoice from U.S.
21 Company 3 noted that the power supply modules were designated as
22 EAR99 and stated that "[t]hese items are controlled by the U.S.
23 Government and authorized for export only to the country of ultimate
24 destination for use by the ultimate consignee or end-user(s) herein
25 identified."

26 Overt Act No. 33: On March 4, 2024, U.S. Company 3 shipped the
27 power supply modules from Lewisville, Texas, to Match Systech in the
28 UAE.

1 Overt Act No. 34: On August 7, 2024, defendant OSTOVARI sent a
2 copy of Proforma Invoice No. MST-PI2425009 from Match Systech in the
3 UAE to Company A in Iran from his MH-SYS email address to his Company
4 A email address. The invoice included 75 units identified as "Power
5 Supply RSD-60H-24," corresponding to the parts purchased from U.S.
6 Company 3.

7 Overt Act No. 35: On October 14, 2024, Co-Conspirator 1 sent
8 defendant OSTOVARI a "letter of payment" regarding Proforma Invoice
9 No. MST-PI2425009. The letter of payment from Match Systech in the
10 UAE to Company A in Iran authorized Co-Conspirator 3 to receive a
11 cash payment of AED 550,000 from Company A for Proforma Invoice No.
12 MST-PI2425009.

13 Overt Act No. 36: On October 15, 2024, defendant OSTOVARI
14 directed Co-Conspirator 1 to arrange the shipment of Proforma Invoice
15 No. MST-PI2425009.

16 Overt Act No. 37: On November 21, 2024, Co-Conspirator 1 sent
17 defendant OSTOVARI a daily report stating, "Sir, Components shipment
18 has been collected. Vessel will depart on Monday." Co-Conspirator 1
19 noted that AED 450,000 of the AED 550,000 payment had been deposited
20 in Match Systech's bank accounts.

21 Overt Act No. 38: On November 26, 2024, Co-Conspirator 1 sent
22 defendant OSTOVARI a copy of the "original shipping documents" for
23 the 75 power supply modules, noting that the "shipment by sea
24 departed yesterday." The attached bill of lading showed that Match
25 Systech had shipped 27 boxes containing "electrical spare parts,"
26 weighing 441 kilograms, by sea from Jebel Ali, UAE, to Bandar Abbas,
27 Iran, on November 23, 2024. The bill of lading listed Company A in
28 Tehran, Iran, as the ultimate consignee of the shipment. The

1 attached commercial invoice included 75 power supply modules
2 identified as "Power Supply RSD-60H-24."

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COUNT TWO

[50 U.S.C. §§ 1705(a), (c);

31 C.F.R. §§ 560.204 and 560.206; 18 U.S.C. §§ 2(a), (b)]

26. The Grand Jury incorporates and realleges the allegations set forth in paragraphs 1 through 17 above, as if fully set forth herein.

27. On or about March 2, 2021, in an offense begun and committed out of the jurisdiction of any particular state or district of the United States, defendant BAHRAM MOHAMMAD OSTOVARI ("OSTOVARI"), who is expected to be arrested in the Central District of California, and others known and unknown, aiding and abetting each other, knowingly and willfully exported, reexported, sold, supplied, attempted to export, and caused to be exported goods and technology from the United States to Iran, and by a United States person, wherever located, to Iran, directly and indirectly, including through the United Arab Emirates, without first having obtained authorization or the required license from the United States Department of the Treasury's Office of Foreign Assets Control ("OFAC").

28. Specifically, defendant OSTOVARI, a United States person, exported, reexported, sold, supplied, attempted to export, and caused to be exported 25 computer modules containing Intel Atom x7-E3950 processors to Company A in Iran, without having obtained authorization or the required license from OFAC.

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COUNT THREE

[50 U.S.C. §§ 1705(a), (c);

31 C.F.R. §§ 560.204 and 560.206; 18 U.S.C. §§ 2(a), (b)]

29. The Grand Jury incorporates and realleges the allegations set forth in paragraphs 1 through 17 above, as if fully set forth herein.

30. On or about November 3, 2024, in Los Angeles County, within the Central District of California, and elsewhere, in an offense begun and committed out of the jurisdiction of any particular state or district of the United States, defendant BAHRAM MOHAMMAD OSTOVARI ("OSTOVARI"), who is expected to be arrested in the Central District of California, and others known and unknown, aiding and abetting each other, knowingly and willfully exported, reexported, sold, supplied, attempted to export, and caused to be exported goods and technology from the United States to Iran, and by a United States person, wherever located, to Iran, directly and indirectly, including through the United Arab Emirates, without first having obtained authorization or the required license from the United States Department of the Treasury's Office of Foreign Assets Control ("OFAC").

31. Specifically, defendant OSTOVARI, a United States person, exported, reexported, sold, supplied, attempted to export, and caused to be exported 40 railway fanless touchscreen panel computers containing Intel Atom E3845 processors to Company A in Iran, without having obtained authorization or the required license from OFAC.

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COUNT FOUR

[50 U.S.C. §§ 1705(a), (c);

31 C.F.R. §§ 560.203, 560.204, 560.205, 560.206;

18 U.S.C. §§ 2(a), (b)]

32. The Grand Jury incorporates and realleges the allegations set forth in paragraphs 1 through 17 above, as if fully set forth herein.

33. On or about November 25, 2024, in Los Angeles County, within the Central District of California, and elsewhere, and in an offense begun and committed out of the jurisdiction of any particular state or district of the United States, defendant BAHRAM MOHAMMAD OSTOVARI ("OSTOVARI"), who is expected to be arrested in the Central District of California, and others known and unknown, aiding and abetting each other, knowingly and willfully exported, reexported, sold, supplied, attempted to export, and caused to be exported goods and technology from the United States to Iran, and by a United States person, wherever located, to Iran, directly and indirectly, including through the United Arab Emirates, without first having obtained authorization or the required license from the United States Department of the Treasury's Office of Foreign Assets Control ("OFAC").

34. Specifically, defendant OSTOVARI, a United States person, exported, reexported, sold, supplied, attempted to export, and caused to be exported 75 power supply modules to Company A in Iran, without having obtained authorization or the required license from OFAC.

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FORFEITURE ALLEGATION

[18 U.S.C. § 981(a)(1)(C) and 28 U.S.C. § 2461(c)]

1. Pursuant to Rule 32.2 of the Federal Rules of Criminal Procedure, notice is hereby given that the United States of America will seek forfeiture as part of any sentence, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28, United States Code, Section 2461(c), in the event of the defendant's conviction of any of the offenses set forth in Counts One through Four of this Indictment.

2. The defendant, if so convicted, shall forfeit to the United States of America the following:

(a) all right, title, and interest in any and all property, real or personal, constituting, or derived from, any proceeds traceable to the offenses; and

(b) to the extent such property is not available for forfeiture, a sum of money equal to the total value of the property described in subparagraph (a).

3. Pursuant to Title 21, United States Code, Section 853(p), as incorporated by Title 28, United States Code, Section 2461(c), the defendant, if so convicted, shall forfeit substitute property, up to the total value of the property described in the preceding paragraph if, as the result of any act or omission of said defendant, the property described in the preceding paragraph, or any portion thereof: (a) cannot be located upon the exercise of due diligence; (b) has been transferred, sold to or deposited with a third party;

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1 (c) has been placed beyond the jurisdiction of the court; (d) has
2 been substantially diminished in value; or (e) has been commingled
3 with other property that cannot be divided without difficulty.
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5

6 A TRUE BILL
7

8 /s/
9 Foreperson

10 BILAL A. ESSAYLI
11 United States Attorney

12 
13

14 DAVID T. RYAN
15 Assistant United States Attorney
Chief, National Security Division

16 IAN V. YANNIELLO
17 Assistant United States Attorney
Chief, Terrorism and Export
Crimes Section

18 DAVID C. LACHMAN
19 Assistant United States Attorney
Terrorism and Export Crimes
Section

20 COLIN S. SCOTT
21 Assistant United States Attorney
Terrorism and Export Crimes
Section
22
23
24
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27
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